IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES of AMERICA,

Plaintiff,

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IGORS PIRINS,

Defendant.

Application GRANTED. The Clerk of Court is directed to mail a copy of this Order to the Defendant at the address listed below and to terminate Doc. #544. SO ORDERED.

May 18, 2022

Crim. No. 1:16-CR-92

JUDGE FURMAN

DEFENDANT'S MOTION FOR EXTENSION OF TIME

1.) Defendant Igors Pirins requests a 30 day enlargement of time in which to submit his reply, until and including, June 17, 2022, unless and except the Court intends to grant Defendant's Motion For Reductionin Sentence (ECF No. 541). Fed. R. Crim. P. 45(b)(1)(A).

I. BACKGROUND

2.) Pursuant to this Court's Order (ECF No. 542), Pirins has until May 18, 2022 to submit his reply to the Government's Opposition.

II. GOUNDS FOR EXTENSION

3.) Pirins is a layman, untrained in the law and requires assistance to fully

and fairly present his reasons for a sentence reduction to this Court. Pirins has obtained the assistance of the FCI Hazelton law clerk. The additional time is needed to meet with the FCI Hazelton law clerk in the law library for the purposes of preparing his reply. Because FCI Hazelton is operating under a modified operations schedule, Pirins access to the FCI Hazelton law library is limited.

III. AUTHORITY

4.) Rule 45(b)(1)(A) authorizes courts to extend the time for a party to act upon a showing of good cause, which is defined as "[a] legally sufficient reason . . . to show why a request should not be granted" Black's Law Dictionary (10th ed. 2014). The First and Fifth Amendments guarantee Pirins "adequate, effective, and meaningful" access to this Court and form the basis of a legally sufficient reason to extend the time for filing a reply, allowing Pirins to meet with and receive assistance from the FCI Hazelton law clerk. Bounds v. Smith, 430 U.S. 817, 822 (1977) (Marshall, J.).

Date: May 11, 2022

Respectfully submitted,

Igors Pirins
USMS No. 86435-054

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Bruceton Mills, WV 26525

Defendant, Pro Se

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